

EXHIBIT E3

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

JOANNE ANDERSON and
GARY ANDERSON,

Plaintiffs,

vs.

BORG-WARNER CORPORATION by
its successor-in-interest
BORG-WARNER MORSE TEC,
INC., et al.,

Defendants.

CAROLYN WEIRICK and ELVIRA
GRACIELA ESCUDERO LORA,

Plaintiffs,

vs.

BRENTAG NORTH AMERICA,
INC., etc., et al.,

Defendants.

Case No.

JCCP 5674/BC666513

Case No.

JCCP 4674/BC656425

DEPOSITION OF

WILLIAM E. LONGO, PhD

March 29, 2018
10:00 a.m.

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Suite 200
Johns Creek, Georgia

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10:58:21 **1** aspect ratios are for what they call nonasbestos
 10:58:24 **2** tremolite.
 10:58:25 **3** Q. I lost -- I got lost somewhere in there
 10:58:28 **4** because the question is had someone asked you to take
 10:58:33 **5** one further step and answer whether or not this is
 10:58:38 **6** asbestiform or not that you're looking at, I'll just
 10:58:41 **7** ask the simple question could you?
 10:58:44 **8** A. I would say with the data we have now,
 10:58:47 **9** it's all asbestiform.
 10:58:48 **10** Q. All of it?
 10:58:49 **11** A. Everything that's above 5:1 aspect ratio,
 10:58:54 **12** it meets Blount's definition, it matches the NIST
 10:59:01 **13** tremolite standard, it matches the Campbell
 10:59:04 **14** definition, so I guess I'm leaning there.
 10:59:06 **15** I don't know if I would say within a
 10:59:08 **16** reasonable degree of scientific certainty, but if you
 10:59:09 **17** want to look at a population, you know, we're looking
 10:59:11 **18** at almost 300 particles out of all these talcs, so
 10:59:15 **19** why wouldn't they all be -- they're all asbestos.
 10:59:19 **20** Q. I just want to make sure I have you on the
 10:59:21 **21** record for this. And your testimony is every fiber
 10:59:24 **22** you've looked at that you've described as an
 10:59:27 **23** amphibole is asbestiform in these studies?
 10:59:29 **24** A. I'm leaning towards that way because we're
 10:59:33 **25** building a population of fibers that we're looking
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10:59:35 **1** at, fibers and bundles.
 10:59:36 **2** I have given the testimony that anything
 10:59:38 **3** we -- anytime we see a bundle, in my opinion it's
 10:59:42 **4** asbestiform. I've given that over and over.
 10:59:46 **5** Now we're looking at just regular fibers.
 10:59:47 **6** If the regular fibers fit in the aspect ratio of what
 10:59:51 **7** Blount calls asbestos, then I'm saying it's all
 10:59:54 **8** asbestos, as well as the counting rules.
 10:59:56 **9** Is that enough of a population to make
 11:00:00 **10** Sanchez happy, since they're pushing the it's all
 11:00:05 **11** nonasbestiform and not a problem, like the Libby,
 11:00:08 **12** Montana, was all nonasbestiform and not a problem?
 11:00:12 **13** Let's see. What other mines did they get into and
 11:00:15 **14** say it was all nonasbestiform and not a problem? It
 11:00:18 **15** seems to be -- at least in my opinion, it seems to be
 11:00:21 **16** an effort from the group to make it all
 11:00:24 **17** nonasbestiform.
 11:00:25 **18** What we're looking at is here's the
 11:00:26 **19** counting rules, it's asbestos, all the bundles are
 11:00:30 **20** asbestos, are all asbestiform, according -- because
 11:00:35 **21** it's unclear to me how, when you break up rock
 11:00:37 **22** pieces, that you can form bundles.
 11:00:40 **23** Q. You understand I'm going to object to that
 11:00:43 **24** as nonresponsive. You got it off your chest, but I'm
 11:00:45 **25** going to object to it.
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11:00:46 **1** A. Not off my chest. It's my opinion.
 11:00:49 **2** Q. I have you down that your opinion is every
 11:00:53 **3** fiber you've identified in any of these studies is
 11:00:57 **4** asbestiform, and I'll move on. Okay?
 11:00:59 **5** A. I said I'm getting there, that we're
 11:01:02 **6** building up a population of positive samples where
 11:01:05 **7** we're looking at the aspect ratio and how it matches
 11:01:08 **8** up to what Blount says as well as what Campbell says.
 11:01:11 **9** Certainly it's all asbestos, by
 11:01:13 **10** definition. Is every fiber asbestiform? Can you
 11:01:16 **11** tell if it's a 5:1 aspect ratio?
 11:01:18 **12** But I think as we build up this population
 11:01:21 **13** of fibers -- and of course we have 80 MDL samples
 11:01:25 **14** now, and we'll be working through those, and that
 11:01:27 **15** will give us the different mines. You know, assuming
 11:01:31 **16** that some percentage of them are positive, we can
 11:01:34 **17** start building up a population of fibers versus the
 11:01:37 **18** less than 5:1 aspect ratio and how that meets up with
 11:01:42 **19** the Blount and Campbell chart.
 11:01:44 **20** Q. I don't want to go through this in any
 11:01:49 **21** huge detail. There's a difference in the methodology
 11:01:51 **22** Blount uses in testing and the methodology you used
 11:01:56 **23** here. That's not a matter of serious dispute, is it?
 11:02:00 **24** A. Well, she used polarized light microscopy,
 11:02:02 **25** but she's used the Blount -- I'm calling it the
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11:02:05 **1** Blount liquid density method, but it's obviously an
 11:02:09 **2** ISO method too for heavy density liquid, and she did
 11:02:13 **3** PLM and then she did what her size distribution was.
 11:02:16 **4** Our size distribution matches pretty well
 11:02:18 **5** except on the tail end. So we have a chart of what's
 11:02:26 **6** said, here's what's in cosmetic talc, here's what I
 11:02:28 **7** found, she compared it to Campbell, Campbell says
 11:02:32 **8** this is what the aspect ratio is on tremolite
 11:02:34 **9** asbestos, and our aspect ratios -- peak aspect ratios
 11:02:39 **10** are slightly higher than that. I can only conclude
 11:02:42 **11** if you look at all our aspect ratios for what's been
 11:02:45 **12** used so far, it matches all asbestos for their two
 11:02:48 **13** charts.
 11:02:48 **14** Q. But you know that my question was you
 11:02:51 **15** didn't use the identical methodology that she used.
 11:02:54 **16** That was my only question.
 11:02:55 **17** A. No, we didn't use the identical
 11:02:58 **18** methodology.
 11:02:59 **19** Q. Okay.
 11:02:59 **20** A. But we got almost identical results.
 11:03:10 **21** Q. So did you have any discussion at all with
 11:03:12 **22** Mr. Lanier or Mr. Panatier or anybody as a part of
 11:03:16 **23** this process about answering the question in your
 11:03:21 **24** report about whether this is asbestiform or not, or
 11:03:24 **25** was it just never discussed?
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11:03:25 **1 A. I didn't get any directions from**
 11:03:28 **2 Mr. Panatier or Mr. Satterley or Mr. Lanier. I have**
 11:03:33 **3 just been going along, and as things come up, we**
 11:03:37 **4 research, do work on it, you know, we're doing more**
 11:03:40 **5 and more work. I've testified in the past that if**
 11:03:43 **6 it's a bundle, it's asbestiform; and if you're just**
 11:03:47 **7 looking at single fibers, you can't tell.**
 11:03:49 **8 Q. And what are the limitations of TEM in**
 11:03:52 **9 connection with answering that question?**
 11:03:55 **10 A. TEM is looking at the single fiber, single**
 11:03:59 **11 bundles, and there's no way to tell with just TEM, if**
 11:04:04 **12 you're looking at a single fiber, if it's asbestiform**
 11:04:07 **13 or not.**
 11:04:07 **14 Q. Well, if it is the bundle that you say**
 11:04:10 **15 makes them, in part, asbestiform, can you and I agree**
 11:04:14 **16 you're not seeing that on TEM?**
 11:04:16 **17 A. Seeing bundles all the time. I mean, half**
 11:04:21 **18 to three quarter of what we find are actually**
 11:04:25 **19 bundles.**
 11:04:25 **20 I think I heard somewhere somebody**
 11:04:27 **21 testified you can't tell that there's a bundle in**
 11:04:29 **22 TEM. Every TEM counting protocol has the definition**
 11:04:32 **23 for bundles, so it certainly is something that is**
 11:04:35 **24 routinely observed, acknowledged, and written down in**
 11:04:40 **25 TEM analysis.**

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11:04:40 **1 Q. Let's just stay with what you've testified**
 11:04:43 **2 to in this litigation and see if that's changed.**
 11:04:46 **3 Do you hold the opinion that based upon**
 11:04:48 **4 the testing you've done, you could not say to a**
 11:04:54 **5 reasonable degree of scientific certainty that any**
 11:04:57 **6 particular fiber you've identified was asbestiform?**
 11:05:00 **7 Have you said that so far in your testimony?**
 11:05:04 **8 A. I may have.**
 11:05:06 **9 Q. Okay. Would you ever write a report that**
 11:05:14 **10 described tremolite as asbestiform versus not**
 11:05:19 **11 commenting at all?**
 11:05:20 **12 A. I don't know.**
 11:05:21 **13 Q. You told me earlier that was more a**
 11:05:23 **14 question for geology.**
 11:05:26 **15 A. No, it's not a question for geology. This**
 11:05:29 **16 whole asbestiform and nonasbestiform is nothing more**
 11:05:31 **17 than a geological commercial term for the grade of**
 11:05:35 **18 asbestos found in any particular mine. The more,**
 11:05:39 **19 quote, asbestiform it is, the more fibrous habitat,**
 11:05:42 **20 the more cross fiber, the more it's worth to whoever**
 11:05:45 **21 owns the mine. That's where this came from.**
 11:05:48 **22 It's been -- now it's trying -- and now**
 11:05:51 **23 it's creeping into the actual -- people are trying to**
 11:05:54 **24 use it in fibers, in bundles, and what we find in**
 11:05:58 **25 accessory minerals, it's not appropriate for that.**

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11:06:01 **1 Q. Have you ever done -- well, strike that.**
 11:06:07 **2 It sounds to me as though you are**
 11:06:09 **3 confident that you're familiar with when and how this**
 11:06:12 **4 debate of asbestiform came to being; correct?**
 11:06:18 **5 A. Correct.**
 11:06:18 **6 Q. Have you ever gone back and looked at the**
 11:06:21 **7 literature over the last 75 years to see whether or**
 11:06:24 **8 not the issue of asbestiform was written on back**
 11:06:28 **9 then?**
 11:06:28 **10 A. Not so much that it's written, but I've**
 11:06:31 **11 looked at the questions I have received, like, for**
 11:06:35 **12 example, you didn't determine the tensile strength**
 11:06:39 **13 because asbestiform has high tensile strength.**
 11:06:42 **14 Well, chrysotile has high tensile**
 11:06:46 **15 strength. Amosite has high tensile strength.**
 11:06:49 **16 Crocidolite has high tensile strength. Tremolite and**
 11:06:54 **17 anthophyllite do not, as compared to the others. And**
 11:06:57 **18 the TEM is absolutely impossible to determine the**
 11:07:01 **19 tensile strength.**
 11:07:01 **20 Q. Okay.**
 11:07:02 **21 A. In a PLM sample it is absolutely**
 11:07:04 **22 impossible to determine the tensile strength. You**
 11:07:06 **23 have to take a sample out of the mine. So I've gone**
 11:07:09 **24 back and looked at other papers where they talked**
 11:07:12 **25 about we did tensile strength because we were heat**

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11:07:18 **1 treating amosite and we wanted to know if it lost its**
 11:07:20 **2 strength.**
 11:07:20 **3 Well, how did they test it? They had big,**
 11:07:22 **4 long pieces that they cut out from a mine sample and**
 11:07:25 **5 put in an angstrom.**
 11:07:26 **6 What does it mean that it's more fibrous**
 11:07:28 **7 and it has this, you know, 1:20, 1:100 average aspect**
 11:07:33 **8 ratio? Well, if you go to the Ontario Mining**
 11:07:37 **9 Association and you look at their grading of**
 11:07:39 **10 chrysotile, you can see why it's important, because**
 11:07:43 **11 crude number 2 is \$1,200 a ton. 3D is \$749 a ton.**
 11:07:50 **12 7M is \$49 a ton. It's all about what the mine is**
 11:07:54 **13 worth.**
 11:07:55 **14 Q. So you've read all that, but you've never**
 11:07:57 **15 encountered any of the articles that talk about the**
 11:08:00 **16 medical significance in the differences?**
 11:08:02 **17 A. I don't get involved in the medical**
 11:08:04 **18 significance. I get involved in what's present in**
 11:08:09 **19 the counting rules that we use to define what's**
 11:08:11 **20 present.**
 11:08:12 **21 Q. You know I don't like to debate with you.**
 11:08:15 **22 You don't get involved in the cost of**
 11:08:18 **23 asbestos either, but you seem to have a strong**
 11:08:20 **24 opinion about it.**
 11:08:21 **25 A. It's not so much a strong opinion. It was**

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11:08:24 **1** why is a geological commercial term coming up with
 11:08:29 **2** accessory minerals found in talc, trying to truncate
 11:08:33 **3** in a geological commercial term into what's found in
 11:08:37 **4** these accessory minerals? It doesn't make any sense
 11:08:45 **5** to me.
 11:08:45 **6** Q. So it's a distinction without a
 11:08:49 **7** difference, in your view, and shouldn't be included
 11:08:51 **8** in an expert report assessing fibers?
 11:08:53 **9** A. I don't know about any expert report.
 11:08:56 **10** Again, what we do is we look at it and define it as
 11:09:01 **11** specified by the counting rules.
 11:09:03 **12** Q. Okay. The counting rules. Did you
 11:09:10 **13** discuss with Mr. Lanier what definition you would use
 11:09:17 **14** to answer the question whether amphibole fibers were
 11:09:20 **15** contained within talc?
 11:09:22 **16** A. To answer the question if there was
 11:09:24 **17** amphibole asbestos contained in the talc, no, I
 11:09:27 **18** didn't discuss with any attorneys what I was going to
 11:09:30 **19** do. That's not appropriate.
 11:09:32 **20** Q. I'm just asking. Nobody asked you then or
 11:09:36 **21** since then how you came up with the method you
 11:09:41 **22** determined you would use?
 11:09:44 **23** A. I'm sure I've been asked by everybody.
 11:09:47 **24** It's in my report.
 11:09:50 **25** Q. Tell me, for example, when you looked
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11:09:54 **1** at -- and my understanding is -- to save a little bit
 11:09:57 **2** of time, hopefully -- that you determined that you
 11:10:00 **3** would use a particular method, and if what you were
 11:10:02 **4** seeing in microscopy satisfied by dimension and
 11:10:09 **5** aspect ratio, the definition of asbestos, that you
 11:10:13 **6** would count it as asbestos; is that a fair
 11:10:15 **7** assessment?
 11:10:15 **8** A. That's fair.
 11:10:16 **9** Q. In your opinion that leaves no other
 11:10:20 **10** questions to be answered at all. The aspect ratio is
 11:10:25 **11** all you need to know to tell me whether or not what
 11:10:28 **12** you're seeing is asbestos?
 11:10:29 **13** A. When you say no other questions, the
 11:10:32 **14** aspect ratio in the counting rules by TEM use
 11:10:37 **15** different methods that tell us exactly what you count
 11:10:40 **16** and report as asbestos.
 11:10:43 **17** Q. Have you ever in your career testified
 11:10:48 **18** that using the counting method alone in TEM and
 11:10:56 **19** including everything only by its aspect ratio and
 11:11:00 **20** nothing else would cause you to include other things
 11:11:03 **21** that you know are not asbestos?
 11:11:10 **22** A. Ever in my career?
 11:11:15 **23** Q. Yes.
 11:11:16 **24** A. I don't recall ever in my career.
 11:11:17 **25** Q. Something that is simply five times longer
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11:11:20 **1** than it is wide can include things other than
 11:11:23 **2** asbestos; correct?
 11:11:25 **3** MR. PANATIER: Just going to object to
 11:11:29 **4** vague and ambiguous as to the methodology.
 11:11:32 **5** THE WITNESS: I don't know about
 11:11:33 **6** everything, but at least everything we've
 11:11:36 **7** counted, it's met the minimum definition and
 11:11:40 **8** even higher. So everything that I believe we've
 11:11:43 **9** counted meets the definition of asbestos.
 11:11:46 **10** Q. (By Mr. Bailey) I lost the question
 11:11:47 **11** there.
 11:11:48 **12** The question is other than an aspect ratio
 11:11:54 **13** of 5:1 would cause you to include a fiber as
 11:11:59 **14** asbestos, did you apply anything else to rule out
 11:12:03 **15** things that were five times longer than they were
 11:12:07 **16** wide but you knew were not asbestos?
 11:12:11 **17** A. We have excluded nonamphibole asbestos
 11:12:15 **18** fibers that might have been present. We didn't count
 11:12:19 **19** all the fibrous talc. We did make some notes about
 11:12:22 **20** the potential of how many was there.
 11:12:25 **21** But when you say anything, I mean, you
 11:12:29 **22** know, that pen is at least 5:1 aspect ratio.
 11:12:33 **23** Wouldn't call it asbestos. In the TEM we may find
 11:12:36 **24** things that is a gypsum fiber. We wouldn't count it
 11:12:39 **25** as asbestos. We've got to put the identification
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11:12:41 **1** along with that, does it match the chemistry of a
 11:12:45 **2** typical amphibole asbestos fiber.
 11:12:48 **3** Q. As you look back over your career, have
 11:12:52 **4** you changed the definition of what you would include
 11:12:56 **5** to be an asbestos fiber by the method you were
 11:13:00 **6** applying to the test?
 11:13:03 **7** A. I don't believe so.
 11:13:05 **8** Q. If a fiber that you see in evaluating talc
 11:13:10 **9** is less than 5:1 aspect ratio, do you include it as
 11:13:16 **10** an asbestos fiber or not?
 11:13:18 **11** A. I think in the 33 or 34, I think we have
 11:13:25 **12** one that's less than 5:1. But typically we tried
 11:13:31 **13** about 300 -- now, we've gone back and analyzed less
 11:13:36 **14** than 5:1. They're not included in the count, but
 11:13:40 **15** they're included in the aspect ratio for our Blount,
 11:13:44 **16** Campbell, NIST charts.
 11:13:47 **17** But we went back to all the samples and
 11:13:51 **18** recounted them to get the lower than 5:1 aspect
 11:13:55 **19** ratio. We didn't include those as asbestos. We just
 11:14:02 **20** included those so that we could have, quote, less
 11:14:03 **21** than 5:1 aspect ratio to match up with what Blount
 11:14:05 **22** and Campbell published.
 11:14:06 **23** Q. And I understand the collection of data
 11:14:08 **24** for other information is one thing. My appreciation
 11:14:09 **25** of what you do is you apply this method, something is
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1 CERTIFICATE

3 STATE OF GEORGIA:

4 COUNTY OF GWINNETT:

6 I hereby certify that the foregoing
 7 transcript was taken down, as stated in the
 8 caption, and the questions and answers thereto
 9 were reduced to typewriting under my direction;
 10 that the foregoing pages 1 through 192 represent
 11 a true, complete, and correct transcript of the
 12 evidence given upon said hearing, and I further
 13 certify that I am not of kin or counsel to the
 14 parties in the case; am not in the regular
 15 employ of counsel for any of said parties; nor
 16 am I in anywise interested in the result of said
 17 case.

18 This, the 5th day of April 2018.

20 DEBRA R. LUTHER, B-881

21 Georgia Certified Court Reporter

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1 COURT REPORTER DISCLOSURE

2 Pursuant to Article 10.B. of the Rules and
 3 Regulations of the Board of Court Reporting of the
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 6 of the taking of the deposition stating the
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 12 entity. Such form shall be attached to the
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1 DEPOSITION OF WILLIAM E. LONGO, PhD /DRL

2 I do hereby certify that I have read all
 3 questions propounded to me and all answers given by
 4 me on the 29th day of March 2018, taken before
 5 Debra R. Luther, and that:

- 6 1) There are no changes noted.
 7 2) The following changes are noted:

8 Pursuant to Rule 30(e) of the Federal Rules of
 9 Civil Procedure and/or the Official Code of Georgia
 10 Annotated 9-11-30(e), both of which read in part:
 11 Any changes in form or substance which you desire to
 12 make shall be entered upon the deposition...with a
 13 statement of the reasons given...for making them.
 14 Accordingly, to assist you in effecting corrections,
 15 please use the form below:

11 Page No. _____ Line No. _____ should read: _____

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1 DEPOSITION OF WILLIAM E. LONGO, PhD /DRL

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8 Page No. _____ Line No. _____ should read: _____

9 Page No. _____ Line No. _____ should read: _____

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12 Page No. _____ Line No. _____ should read: _____

13 WILLIAM E. LONGO, PhD

14 Sworn to and subscribed before me,

15 This, the _____ day of _____ 20____.

16 Notary Public
17 My commission expires: _____

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